

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :  
Curtis A. Raymond : Chapter 13  
Anne M. Raymond : Case No.: 19-15647-ELF  
Debtor(s) :

SUPPLEMENTAL APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR SERVICES PERFORMED AFTER CONFIRMATION OF CHAPTER 13 PLAN

Brad J. Sadek, Esquire applies under § 330 of the Code for an Order directing the Chapter 13 Trustee to pay an award of compensation and reimbursement of actual, necessary expenses for services performed after confirmation of the above-mentioned debtor's chapter 13 plan and represents:

1. The debtor(s) filed a petition under Chapter 13 of the September 11, 2019.
3. This Court has previously approved an Application for Compensation of Counsel Fees in the amount of \$4,250.00.
4. Applicant requests an award of supplemental compensation of \$1,000.00 for 4.1 hours expended in providing the following services:

Date	Work Completed	By Whom	Hours
09/15/2020	Correspondence to Debtor regarding Motion to Dismiss for Plan Payments	Paralegal	0.3
02/01/2021	Correspondence to Debtor regarding Motion for Relief	Paralegal	03
02/18/2021	Preparation of Response to MFR and review of the same with Debtor	Attorney	1.0
03/04/2021	Review and execution of Stipulation with opposing counsel and review of the same with Debtor	Attorney	0.5
03/15/2021	Preparation of Motion to Modify Plan, Modified Plan, and Amended Schedule J and review of the same with Debtor	Attorney	1.5
03/15/2021	E-filing of Motion to Modify Plan, Modified Plan, Notice of Motion, Amended Schedule J and E-service of the same	Paralegal	0.5

*Total Hours: 4.1*

- 5. Applicant requests that compensation be awarded at the following hourly rate(s):  
**Attorney Fees:** \$335.00/hr  
**Paralegal Fees:** \$125.00 hr
6. Applicant requests reimbursement of expenses in the amount of \$0.00.
7. Attached as Exhibit B is a copy of the applicants time records setting forth the dates and amount of time expended for the services performed on behalf of the debtor after confirmation of debtor's chapter 13 plan.
8. All services rendered and expenses incurred for which compensation or reimbursement is requested

a. were performed or incurred for or on behalf of the debtor, the services and expenses were actual and necessary, and the compensation requested for those services is reasonable; and

b. are not duplicative of services and expenses for which compensation or reimbursement was previously requested.

9. If this supplemental application is granted, the debtor's confirmed chapter 13 plan (check whichever is applicable)

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☒ is adequately funded.

☐ is not adequately funded.

10. None of the compensation paid to applicant will be shared with any person other than a member or regular associate of applicant's law firm unless 11 U.S.C §504(c) applies.

WHEREFORE, Applicant requests an award of \$ **1,000.00** in compensation and of \$      in reimbursement of actual, necessary expenses.

Dated: **November 9, 2021**

Signed: **/s/ Brad J. Sadek, Esquire**  
Applicant

By: **Brad J. Sadek, Esquire**

Name: **Sadek and Cooper**

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